

JAN 11 2011

FILED COURT
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S.D. OF N.Y.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Respondents.

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: 10 CIV 3036 (AKH)
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: MOTION TO ADMIT
COUNSEL PRO HAC VICE
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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, Thomas A. Egan, Esq., a
member in good standing of the Bar of this Court and an attorney with the firm of

Flemming Zulack Williamson Zauderer LLP, counsel for Respondent herein, hereby moves for an Order allowing the admission *pro hac vice* of:

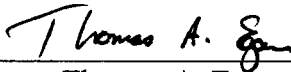
Donald R. Erlandson, Esq.
Howrey LLP
550 South Hope Street, Suite 1100
Los Angeles, CA 90071
Telephone (213) 892-1800
Facsimile: (213) 892-2300
E-mail: erlandsond@howrey.com

Donald R. Erlandson is a member in good standing of the Bar of the State of California and is also admitted to practice before the United States Courts of Appeals for the Second and Ninth Circuits, and the United States District Courts for the Central and Southern Districts of California.

There are no pending disciplinary proceedings against Donald R. Erlandson in any State or Federal court.

Dated: New York, New York
January 11, 2011

Respectfully submitted,



Thomas A. Egan, Esq.
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David W. Steuber, Esq. (*pro hac vice* application pending)
Tyrone R. Childress, Esq. (*pro hac vice* application pending)
Donald R. Erlandson, Esq. (*pro hac vice* application pending)
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Attorneys for Respondent 7 World Trade Company, L.P.
(sued in its own name and incorrectly sued under the name of
the nonexistent "7 World Trade Center, L.P.")

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INDUSTRIAL RISK INSURERS,

Petitioner,

--against--

7 WORLD TRADE CENTER, L.P.,
7 WORLDTRADE COMPANY, L.P.

Respondents.
-----X

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: 10 CIV 3036 (AKH)
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: **AFFIDAVIT OF THOMAS**
: **A. EGAN IN SUPPORT**
: **OF MOTION TO ADMIT**
: **COUNSEL *PRO HAC VICE***
:
:

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

THOMAS A. EGAN, ESQ., being duly sworn, hereby deposes and says as follows:

1. I am Of Counsel to the firm of Flemming Zulack Williamson Zauderer LLP, counsel for Respondent 7 World Trade Company, L.P. ("Respondent") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Respondent's motion to admit Donald R. Erlandson as counsel *pro hac vice* to represent Respondent in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1985. I am also admitted to the Bar of the United States District Court for the Southern District of New York and am in good standing with this Court.

3. Mr. Erlandson is a Senior Attorney at Howrey LLP, in Los Angeles, California. Mr. Erlandson is a member in good standing of the Bar of the State of California. A Certificate of Good Standing issued by Supreme Court of California regarding Mr. Erlandson is attached hereto as Exhibit A.

4. Mr. Erlandson is a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Donald R. Erlandson, *pro hac vice*.

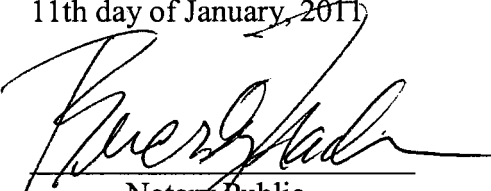
6. I respectfully submit a proposed order granting the admission of Donald R. Erlandson, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Donald R. Erlandson, *pro hac vice*, to represent Respondents in the above-captioned matter, be granted.



THOMAS A. EGAN

Sworn to before me this
11th day of January, 2011



Notary Public

BEVERLY R. NACHIMSON
Notary Public, State of New York
No. 01NA6153052
Qualified in New York County
Commission Expires September 25, 2014



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

Donald Robert Erlandson

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that Donald Robert Erlandson was on the 6th day of December, 1999 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 20th day of December, 2010*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By:  _____
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INDUSTRIAL RISK INSURERS,	:	10 CIV 3036 (AKH)
	:	
Petitioner,	:	
	:	
--against--	:	ORDER FOR ADMISSION
	:	<i>PRO HAC VICE</i> ON
7 WORLD TRADE CENTER, L.P.,	:	<u>WRITTEN MOTION</u>
7 WORLD TRADE COMPANY, L.P.	:	
	:	
Respondents.	:	
-----X	:	

Upon the motion of Thomas A. Egan, Esq., attorney for Respondent 7 World Trade Company, L.P. (sued in its own name and incorrectly sued under the name of the nonexistent "7 World Trade Center, L.P.") and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Donald R. Erlandson, Esq.
HOWREY LLP
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Los Angeles, California 90071
Telephone: (213) 892-1800
Facsimile: (213) 892-2300
Email: erlandsond@howrey.com

is admitted to practice *pro hac vice* as counsel for 7 World Trade Company, L.P. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

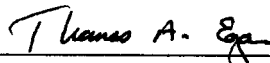
Dated: New York, New York
January __, 2011

United States District Judge

CERTIFICATE OF SERVICE

THOMAS A. EGAN, ESQ., an attorney admitted to the Bar of this Court, hereby certifies that, on January 11, 2011, I caused the within Motion to Admit Counsel *Pro Hac Vice* to be served on Mary Kay Vysokocil, Esq., counsel for Petitioner, by having a true copy of same placed in an envelope bearing appropriate first-class postage and addressed to Ms. Vysokocil at her office, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017, and delivered to a receptacle in the exclusive care and custody of the United States Postal Service. An electronic courtesy copy of same was also delivered to Ms. Vysokocil via e-mail directed to her e-mail address [mvyskocil@stblaw.com].

Dated: January 11, 2011
New York, New York



THOMAS A. EGAN